

Exhibit 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MOHAMMED THANI A.T. AL-THANI,
Plaintiff, : Case No.:
: 20-cv-4765 (JPC)

-against-

ALAN J. HANKE et al.,
Defendants. :
:
consolidated with

MARTIN JOHN STEVENS,
Plaintiff, : Case No.:
: 20-cv-8181 (JPC)

-against-

ALAN J. HANKE et al.,
Defendants. :
:
- - - - -x

VOLUME II

Continued remote, videotaped deposition of ALAN
J. HANKE, taken pursuant to Notice, was held via videoconference,
commencing October 5, 2023, at 9:38 a.m. Central Time, on the
above date, before Amanda McCredo, a Court Reporter and Notary
Public in the State of New York.

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<p>1</p> <p>2 A P P E A R A N C E S: (via videoconference)</p> <p>3 Appearing on behalf of Mohammed Thani A.T. Al-Thani:</p> <p>4 MICHAEL HEFTER, ESQ.</p> <p>5 SCOTT O'BRIEN, ESQ.</p> <p>6 Alston & Bird, LLP</p> <p>7 90 Park Avenue</p> <p>8 15th Floor</p> <p>9 New York, New York 10016</p> <p>10 michael.hefter@alston.com</p> <p>11 scott.obrien@alston.com</p> <p>12 212.210.9400</p> <p>13</p> <p>14 Appearing on behalf of Martin John Stevens:</p> <p>15 PHILIPP SMAYLOVSKY, ESQ.</p> <p>16 Chelney Law Group PLLC</p> <p>17 28 Liberty Street</p> <p>18 6th Floor</p> <p>19 New York, New York 10005</p> <p>20 philipp@chelneylaw.com</p> <p>21 212.653.0022</p> <p>22</p> <p>23 Also Present:</p> <p>24 Alan J. Hanke, pro se</p> <p>25 Amy Roy-Haeger</p> <p>Sherry Sims</p> <p>Chelsea Gilchrist - videographer</p>	<p>1</p> <p>2 Exhibit 66 CTRL00009601 native 698</p> <p>3 Exhibit 67 PLF00002085 through 2087 701</p> <p>4 Exhibit 68 HANKE00757.pdf 703</p> <p>5 Exhibit 69 PLF00000575 through 577 704</p> <p>6 Exhibit 70 PLF00001921 708</p> <p>7 Exhibit 71 CTRL00000299 native 713</p> <p>8 Exhibit 72 PLF00000738 through 740 715</p> <p>9 Exhibit 73 CTRL00009579 native 719</p> <p>10 Exhibit 74 PLF00000524 through 528 722</p> <p>11 Exhibit 75 AH_095588 through 95601 729</p> <p>12 Exhibit 76 AH_099110 through 116 737</p> <p>13 Exhibit 77 AH_094257 through 340\ 744</p> <p>14 Exhibit 78 Al Thani Transaction Accounting 768</p> <p>15 Exhibit 79 Photograph 769</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1</p> <p>2 I N D E X</p> <p>3 WITNESS EXAMINATION BY PAGE</p> <p>4 Alan J. Hanke Mr. Hefter 498</p> <p>5</p> <p>6 EXHIBITS</p> <p>7 EXHIBIT PAGE</p> <p>8 Exhibit 49 PLF00000587 through 588 626</p> <p>9 Exhibit 49A Managed Leveraging Program 626</p> <p>10 Exhibit 50 PLF00000451 through 453 631</p> <p>11 Exhibit 51 PLF00000935 through 941 638</p> <p>12 Exhibit 52 PLF00000263 651</p> <p>13 Exhibit 53 PLF00009673 native 652</p> <p>14 Exhibit 54 RSM-A00002 through 012 663</p> <p>15 Exhibit 55 PLF00001940 through 1941 667</p> <p>16 Exhibit 56 PLF00000890 through 891 668</p> <p>17 Exhibit 57 PLF00000192 through 193 672</p> <p>18 Exhibit 58 CTRL00009654 native 677</p> <p>19 Exhibit 59 CTRL00009520 native 681</p> <p>20 Exhibit 60 PLF00001097 through 1098 682</p> <p>21 Exhibit 61 PLF00002107 684</p> <p>22 Exhibit 62 PLF00001099 through 1104 685</p> <p>23 Exhibit 63 PLF00000878 through 881 687</p> <p>24 Exhibit 64 PLF00001628 through 1630 690</p> <p>25 Exhibit 65 PLF00000530 through 531 694</p>	<p>1</p> <p>2 THE VIDEOGRAPHER: Good morning. We are</p> <p>3 going on the record at 9:38 a.m. Central Time</p> <p>4 on Thursday, October 5, 2023.</p> <p>5 Please note that this deposition is being</p> <p>6 conducted virtually. Quality of recording</p> <p>7 depends on the quality of camera and Internet</p> <p>8 connection of participants. What is seen --</p> <p>9 what is seen from the witness and heard on</p> <p>10 screen is what will be recorded.</p> <p>11 Audio and video recording will continue to</p> <p>12 take place unless all parties agree to go off</p> <p>13 the record.</p> <p>14 This is Media Unit 1 of the video-recorded</p> <p>15 deposition of Alan J. Hanke in the matter of</p> <p>16 Mohammed Thani A.T. Al-Thani versus Alan</p> <p>17 J. Hanke, et. al., consolidated with Martin</p> <p>18 John Stevens versus Alan J. Hanke, et. al.,</p> <p>19 filed in the United States District Court,</p> <p>20 Southern District of New York, case numbers</p> <p>21 20-cv-765 (JPC) and 20-cv-8181 (JPC).</p> <p>22 This deposition is being conducted remotely</p> <p>23 using virtual technology.</p> <p>24 My name is Chelsea Gilchrist, representing</p> <p>25 Veritext Legal Solutions, and I am the</p>

2 (Pages 493 - 496)

<p style="text-align: right;">Page 497</p> <p>1 2 videographer. 3 The court reporter is Amanda McCredo, from 4 the firm Veritext Legal Solutions. 5 I am not authorized to administer an oath. 6 I am not related to any party in this action, 7 nor am I financially interested in the outcome. 8 If there are any -- 9 MR. HEFTER: Chelsea? Sorry. 10 THE VIDEOGRAPHER: Yes. 11 MR. HEFTER: You can finish your 12 introduction, and I -- we're frozen with 13 Mr. Hanke, so I can't see any movement on the 14 screen. 15 THE VIDEOGRAPHER: Would you like me to 16 take us off the record before I continue, sir? 17 I can see Mr. Hanke move. I'm not sure if 18 you can now. 19 MR. HEFTER: We should go off the record, 20 then. 21 THE VIDEOGRAPHER: Got it. 22 We are going off the record. The time is 23 9:40 a.m. 24 (Recess taken.) 25 THE VIDEOGRAPHER: We are going back on the</p>	<p style="text-align: right;">Page 499</p> <p>1 A. Hanke 2 first duly sworn by a Notary Public of the State of 3 New York, was examined and testified as follows: 4 EXAMINATION BY 5 MR. HEFTER: 6 Q Mr. Hanke, hi. I'm Michael Hefter, as you 7 know, from Alston & Bird, and I represent the 8 plaintiff Mr. Al-Thani. 9 We've never met before, other than either 10 in court or in a deposition, correct? 11 A That is correct, sir. 12 Q And I take it that currently you are 13 sitting in your residence in Illinois? 14 A I am. 15 Q And can you just state for the record what 16 the address of your residence is? 17 A 4121 Wyndwood Drive, Crystal Lake, Illinois 18 60014. 19 Q Thank you. 20 I want to confirm your understanding that 21 me and my law firm are representing an adverse party 22 against you and we're seeking a significant amount 23 of damages against you and IOLOs. 24 Is that your understanding? 25 A That is what's been presented to me, yes.</p>
<p style="text-align: right;">Page 498</p> <p>1 A. Hanke 2 record. The time is 9:44 a.m. Central Time. 3 I am picking up with the read-on. 4 I am not authorized to administer an oath. 5 I am not related to any party in this action, 6 nor am I financially interested in the outcome. 7 If there are any objections to proceeding, 8 please state them at the time of your 9 appearance. 10 Counsel and all present, including 11 remotely, will now state their appearances and 12 affiliations for the record, beginning with the 13 noticing attorney. 14 MR. HEFTER: Hi, this is Michael Hefter and 15 Scott O'Brien, from the law firm of Alston & 16 Bird, on behalf of plaintiff Mohammed Al-Thani. 17 MR. SMAYLOVSKY: My name is Philipp 18 Smaylovsky. I'm with Chelney Law Group on 19 behalf of Martin J. Stevens. 20 MR. HEFTER: And for the record, Madam 21 Court Reporter, Mr. Hanke is representing 22 himself, pro se. 23 THE VIDEOGRAPHER: Will the court reporter 24 swear in the witness. 25 A L A N H A N K E, the witness herein, after having been</p>	<p style="text-align: right;">Page 500</p> <p>1 A. Hanke 2 Q And you also understand that me or anybody 3 in my law firm or Mr. Smaylovsky are not 4 representing your interests in any way; is that 5 correct? 6 A That is correct. 7 Q And is it my understanding that currently 8 you do not have an attorney that's representing you 9 in connection with these consolidated cases? 10 A I do not. 11 Q Thank you. 12 And am I correct that you're the only one 13 sitting in that room at your house with you right 14 now? 15 A Besides my cat, no other humans. 16 Q That's fine. Thank you. 17 So, I heard you testify yesterday that your 18 recollection was that you were deposed once before, 19 approximately 20 to 25 years ago. 20 Did I hear that correctly? 21 A Yes, sir. 22 Q Okay. 23 I want to see if I can refresh your 24 recollection. 25 Do you recall having a conversation with</p>

<p style="text-align: right;">Page 501</p> <p>1 A. Hanke</p> <p>2 Mr. William Slater Vincent in or around July of</p> <p>3 2019, when you had indicated to him that you were in</p> <p>4 a deposition?</p> <p>5 A I don't remember, no.</p> <p>6 Q And you have no recollection that you were</p> <p>7 sitting for a deposition in a litigation in or</p> <p>8 around July of 2019?</p> <p>9 A There were, there were -- there was a</p> <p>10 deposition -- I don't think it was a deposition</p> <p>11 in -- there was a sitdown with a lawyer. I don't</p> <p>12 think it was called a deposition. It was called a</p> <p>13 discovery.</p> <p>14 The other deposition I did was for a case</p> <p>15 that was in Southern California. So, I don't think</p> <p>16 that they were related.</p> <p>17 Q Okay.</p> <p>18 So, sitting here today, you don't have a</p> <p>19 recollection of being deposed in a case in July of</p> <p>20 2017?</p> <p>21 A Not that I remember, sir.</p> <p>22 Q Okay.</p> <p>23 So, that being said, I just want to go</p> <p>24 through some ground rules for today. I think</p> <p>25 Mr. Smaylovsky also went through them, but I'd like</p>	<p style="text-align: right;">Page 503</p> <p>1 A. Hanke</p> <p>2 breaks. I don't know if I could achieve that.</p> <p>3 But if at any point in time you need a</p> <p>4 break, please let me know. And, certainly, if I</p> <p>5 need a break, I will let you know, as well.</p> <p>6 Do you understand that?</p> <p>7 A I do.</p> <p>8 Q Okay.</p> <p>9 And we will use the same protocol as</p> <p>10 yesterday in terms of showing you documents, which I</p> <p>11 think worked pretty well, but we'll do -- we'll use</p> <p>12 the same protocol as yesterday.</p> <p>13 So, I'll ask you whether you have seen or</p> <p>14 access to the exhibit link.</p> <p>15 A I do have access to it, and I'm already</p> <p>16 signed in.</p> <p>17 Q Okay. Great. Thank you.</p> <p>18 Okay. That preliminary stuff out of the</p> <p>19 way, can you tell me where you went to college?</p> <p>20 A I went to several -- I went to college in</p> <p>21 Rockford, at the Rock Valley Technical School; and I</p> <p>22 went to the Culinary Institute of America; and I</p> <p>23 went to American Flyers, which was a technical</p> <p>24 school.</p> <p>25 Q And did you say "Rockville"?</p>
<p style="text-align: right;">Page 502</p> <p>1 A. Hanke</p> <p>2 to give you my version of them, which is that I'll</p> <p>3 be asking you questions. You'll be answering my</p> <p>4 questions.</p> <p>5 It's best if we don't talk over each other.</p> <p>6 It's frequent that it happens. But for the benefit</p> <p>7 of the record and the benefit of the court reporter,</p> <p>8 who is transcribing this, it would be helpful if we</p> <p>9 try to, the best we can, not speak over each other.</p> <p>10 If my question is unclear in any way,</p> <p>11 please ask me to reframe it or just tell me that you</p> <p>12 don't understand my question. It's possible that</p> <p>13 you will not. So, just let me know.</p> <p>14 Because you're representing yourself, if</p> <p>15 you feel that a question that I'm asking is</p> <p>16 objectionable, you can state on the record,</p> <p>17 "Objection," and I will either tell you you should</p> <p>18 go ahead and answer, or reframe my question if I</p> <p>19 believe that your objection is valid.</p> <p>20 Do you understand that?</p> <p>21 A I do, sir.</p> <p>22 Q Okay.</p> <p>23 The other thing I would say is that I</p> <p>24 applaud you and Mr. Smaylovsky yesterday about your</p> <p>25 powering through long periods of time without</p>	<p style="text-align: right;">Page 504</p> <p>1 A. Hanke</p> <p>2 A Rock Valley, sir.</p> <p>3 Q Oh, Rock Valley. Thank you.</p> <p>4 So, Rock Valley, is that -- where is that</p> <p>5 located?</p> <p>6 A Rockford, Illinois.</p> <p>7 Q And what -- what degree did you get there?</p> <p>8 A Aviation maintenance authorization, and I</p> <p>9 minored in finance.</p> <p>10 Q And is the aviation maintenance a</p> <p>11 bachelor's degree?</p> <p>12 A It's equivalent of one. It's a -- by</p> <p>13 rights, I guess you could call it, yes.</p> <p>14 Q And the Culinary Institute, that's in New</p> <p>15 York?</p> <p>16 A It's in Hyde Park, New York, through a</p> <p>17 mentorship program.</p> <p>18 Q What did you -- what degree did you get</p> <p>19 from the Culinary Institute with --</p> <p>20 A A six-month culinary mentorship program, an</p> <p>21 experience program.</p> <p>22 Q And then with respect to the aviation</p> <p>23 degree, where and what was that, if you can explain</p> <p>24 that to me?</p> <p>25 A I was -- I got a private, an instrument,</p>

<p style="text-align: right;">Page 505</p> <p>1 A. Hanke</p> <p>2 and a commercial certificate, which is equivalent to</p> <p>3 the master's in aviation, from American Flyers in</p> <p>4 DuPage, Illinois.</p> <p>5 Q And are you certified by the Federal</p> <p>6 Aviation --</p> <p>7 A Administration?</p> <p>8 Q -- Administration to fly planes?</p> <p>9 A I am, sir.</p> <p>10 Q And do you maintain that certificate?</p> <p>11 A I do.</p> <p>12 Q After -- and what year did you obtain your</p> <p>13 bachelor's degree at Rock Valley?</p> <p>14 A It was in the early '80s. I'm going to</p> <p>15 guess around '86. I don't remember exactly. It was</p> <p>16 a long time ago.</p> <p>17 Q I should ask you, what's your birthdate,</p> <p>18 sir?</p> <p>19 A July 1, 1964.</p> <p>20 Q And after receiving your degree from Rock</p> <p>21 Valley, did you enter the workforce?</p> <p>22 A I had always been working throughout that</p> <p>23 whole period of time.</p> <p>24 Q And is it fair to say, based on that</p> <p>25 answer, that you had, you know, multiple jobs at any</p>	<p style="text-align: right;">Page 507</p> <p>1 A. Hanke</p> <p>2 You indicated that you worked for Weber.</p> <p>3 Is that the company that makes barbecues</p> <p>4 and grills?</p> <p>5 A Yes, sir. At the time, it was called the</p> <p>6 Weber-Stephens Corporation.</p> <p>7 Q And in what capacity were you flying for</p> <p>8 them?</p> <p>9 A I was hired at 19 years old to fly as a</p> <p>10 co-pilot on one of their twin-engine aircraft, until</p> <p>11 I received my commercial certificate at the age of</p> <p>12 21. And I moved to a captain's position. I think I</p> <p>13 worked there until I was 25 or 26.</p> <p>14 Q So, that would put us in or around 1990,</p> <p>15 correct?</p> <p>16 A Sure.</p> <p>17 Q And in connection with flying for</p> <p>18 Weber-Stephens Corporation, was that flying</p> <p>19 executives around the country or is that flying</p> <p>20 product for delivery to stores and the like, or</p> <p>21 both?</p> <p>22 A It was mostly corporate. Every once in a</p> <p>23 while, there was a product movement, but it wasn't</p> <p>24 the full-time job.</p> <p>25 Q So, in 1990, where did you go work?</p>
<p style="text-align: right;">Page 506</p> <p>1 A. Hanke</p> <p>2 one point in time?</p> <p>3 A It's possible. I mean, I grew up in the</p> <p>4 restaurant business, as my -- as my family</p> <p>5 background. So, I was always involved in that</p> <p>6 business, one way or another.</p> <p>7 And aviation was a dream. So, I was</p> <p>8 employed by Weber-Stephens Corporation, Weber</p> <p>9 barbecue, at an early age, flying.</p> <p>10 I had several different industry positions.</p> <p>11 Q Let's -- let's go through those industry</p> <p>12 positions.</p> <p>13 So, my understanding is that your parents</p> <p>14 own several restaurants in or around Chicago; is</p> <p>15 that right?</p> <p>16 A Yes, sir.</p> <p>17 Q And does your family still own those</p> <p>18 restaurants?</p> <p>19 A No, sir. Both of my parents are deceased.</p> <p>20 Q Did you ever own any of those restaurants</p> <p>21 independent of your parents or after your parents</p> <p>22 had retired?</p> <p>23 A None of those, no.</p> <p>24 Q So, let's focus on your history in the</p> <p>25 aviation industry after receiving your degrees.</p>	<p style="text-align: right;">Page 508</p> <p>1 A. Hanke</p> <p>2 A I stayed in the aviation industry. I</p> <p>3 think, around that time, I had bought an airplane</p> <p>4 and started my own owner/operator Part 135 business.</p> <p>5 And that lasted through about the year 2000.</p> <p>6 Q And what was the name of the Part 135</p> <p>7 business?</p> <p>8 A Alan Air, Incorporated.</p> <p>9 Q Is that corporate -- corporate entity still</p> <p>10 in existence?</p> <p>11 A No.</p> <p>12 Q Do you know when it ceased being in</p> <p>13 existence?</p> <p>14 A I don't. It lasted a few years after that,</p> <p>15 but we never pursued any further interests, if I</p> <p>16 remember correctly.</p> <p>17 Q Do you know if it's still a corporation in</p> <p>18 good standing in the state in which it was</p> <p>19 incorporated?</p> <p>20 A I don't think so. Illinois requires annual</p> <p>21 reports. And if those aren't paid, I think they go</p> <p>22 dormant and/or delinquent.</p> <p>23 Q Did Alan Air own any assets?</p> <p>24 A They did.</p> <p>25 Q What were those assets?</p>

<p style="text-align: right;">Page 509</p> <p>1 A. Hanke</p> <p>2 A Back then, it was a Cessna 414, and then it</p> <p>3 was a C90 King Air.</p> <p>4 Q Thank you for that answer, Mr. Hanke.</p> <p>5 MR. HEFTER: Chelsea, there is -- one of</p> <p>6 the defendants wants to get access, and she's</p> <p>7 having difficulty.</p> <p>8 So, can we just go off the record and pause</p> <p>9 for a second and see if we can get her in?</p> <p>10 THE VIDEOGRAPHER: Sure. I will take us</p> <p>11 off the record.</p> <p>12 We are going off the record. The time is</p> <p>13 9:59 a.m.</p> <p>14 (Recess taken.)</p> <p>15 THE VIDEOGRAPHER: We are going back on the</p> <p>16 record. The time is 10:02 a.m.</p> <p>17 BY MR. HEFTER:</p> <p>18 Q So, Mr. Hanke, we were just talking about</p> <p>19 the Part 135 business, and I believe that took us up</p> <p>20 to the year 2000.</p> <p>21 After 2000, did you stop operating the Alan</p> <p>22 Air business?</p> <p>23 A We still continued. I just don't remember</p> <p>24 what date that was. It was a long time ago.</p> <p>25 But after that aircraft was sold, we</p>	<p style="text-align: right;">Page 511</p> <p>1 A. Hanke</p> <p>2 whether it be management positions or other</p> <p>3 consultant, things of that nature. Mostly on the</p> <p>4 finance side in that business.</p> <p>5 Q Did you receive -- did you receive wages in</p> <p>6 connection with those positions?</p> <p>7 A Yes, sir.</p> <p>8 Q Those were W-2s that you received?</p> <p>9 A Yes, sir.</p> <p>10 Q Do you have records of those W-2s?</p> <p>11 A Not from the '90s or 2000s, no, sir.</p> <p>12 Q So, is it your testimony that you were</p> <p>13 employed by corporate entities as a consultant or</p> <p>14 manager in those businesses?</p> <p>15 A Yes.</p> <p>16 Q Do you have any ownership interest in any</p> <p>17 of those entities that you worked for?</p> <p>18 A No, sir.</p> <p>19 Q You weren't a partner in any of those</p> <p>20 businesses?</p> <p>21 A Not that I can recall. Nothing that I</p> <p>22 consulted with, no.</p> <p>23 Q All right.</p> <p>24 You don't recall ever receiving a K-1 from</p> <p>25 any of the entities in which you were employed?</p>
<p style="text-align: right;">Page 510</p> <p>1 A. Hanke</p> <p>2 stopped operating that business, yes.</p> <p>3 Q What business did you enter after that</p> <p>4 date?</p> <p>5 A I was back in the restaurant business, food</p> <p>6 and beverage business. I did some work with an</p> <p>7 aviation firm in Milwaukee, sporadic work as a sales</p> <p>8 consultant.</p> <p>9 Q What was the name of that company in</p> <p>10 Milwaukee?</p> <p>11 A Sterling Aviation.</p> <p>12 Q And how long were you engaged in business</p> <p>13 in the food and beverage industry with respect to</p> <p>14 Sterling Aviation?</p> <p>15 A Sterling Aviation was strictly an</p> <p>16 aviation-related sales and marketing position.</p> <p>17 Q Yup.</p> <p>18 A That lasted several years, off and on. I</p> <p>19 couldn't tell you, to be exact.</p> <p>20 And I've always been in the food and</p> <p>21 beverage business my whole life. So, that's always</p> <p>22 been a staple in my background.</p> <p>23 Q When you say you've "always been in the</p> <p>24 food and beverage business," what does that mean?</p> <p>25 A Well, from various jobs and positions,</p>	<p style="text-align: right;">Page 512</p> <p>1 A. Hanke</p> <p>2 A Back in the 2000s?</p> <p>3 Q Yes.</p> <p>4 A Not that I recall, sir. It's possible, but</p> <p>5 not that I recall.</p> <p>6 Q Did there come a point in time when you</p> <p>7 shifted away from the food and beverage business and</p> <p>8 entered into any other type of business?</p> <p>9 A I've always been pretty diverse as an</p> <p>10 entrepreneur. So, I was always around the</p> <p>11 restaurant business, aviation business, doing things</p> <p>12 as a consultant for financial work, like profit and</p> <p>13 loss statements and things of that nature, to see</p> <p>14 how the health of the current business is still.</p> <p>15 I've always been an entrepreneur in those respects.</p> <p>16 Q It's fair to say that you do not -- you</p> <p>17 don't have a degree in accounting, correct?</p> <p>18 A I do not have a degree in accounting, no.</p> <p>19 Q Is it fair to say, based on that, that</p> <p>20 you're not a certified public accountant, correct?</p> <p>21 A I am not, sir.</p> <p>22 Q It's fair to say that you've never worked</p> <p>23 for an auditing firm?</p> <p>24 A I've never worked for an auditing firm.</p> <p>25 Q Have you ever been the Chief Financial</p>

<p style="text-align: right;">Page 513</p> <p>1 A. Hanke</p> <p>2 Officer of any entity?</p> <p>3 A Yes.</p> <p>4 Q Okay.</p> <p>5 Which -- which ones are those?</p> <p>6 A Free Phone Project and White Label</p> <p>7 Solutions.</p> <p>8 Q I'll get back to those in a second.</p> <p>9 So, did there come a point in time in the</p> <p>10 2000s where you went to work for any other entity</p> <p>11 outside the food and beverage industry?</p> <p>12 A I had various positions throughout,</p> <p>13 especially as a consultant, talking to industries</p> <p>14 all the time. There were a lot of things going on</p> <p>15 back then that are both entrepreneurial that I owned</p> <p>16 and partnerships that I had.</p> <p>17 Q Okay.</p> <p>18 Do you recall, in August of 1989, that an</p> <p>19 entity called Northern Illinois Flight Center filed</p> <p>20 a small claim judgment against you?</p> <p>21 A Yes, I do.</p> <p>22 Q Okay.</p> <p>23 Do you recall, in September of 1989, the</p> <p>24 Buckingham Court Apartments filed an eviction case</p> <p>25 against you?</p>	<p style="text-align: right;">Page 515</p> <p>1 A. Hanke</p> <p>2 A I do.</p> <p>3 Q And what was IntelliCommunications Network,</p> <p>4 Inc.?</p> <p>5 A They were a reseller of managed phone time.</p> <p>6 Phone cards were very large back then,</p> <p>7 popularity-wise, and they were a seller of those</p> <p>8 phone cards.</p> <p>9 Q Whatever happened to that entity?</p> <p>10 A Got bought out by MCI and AT&T.</p> <p>11 And that whole industry fizzled out after a</p> <p>12 period of time based on cell phones and cellular</p> <p>13 service.</p> <p>14 Q Do you recall that, in or around this same</p> <p>15 point in time, an entity called Frontier</p> <p>16 Communications West sued IntelliCommunications</p> <p>17 Network in a contract dispute?</p> <p>18 A Sure do.</p> <p>19 Q Going back to the Northern Illinois Flight</p> <p>20 Center, did you satisfy the judgment in that case?</p> <p>21 A Yes.</p> <p>22 Q In connection with the eviction case, did</p> <p>23 you satisfy your lease payment obligations?</p> <p>24 A Yes, I did.</p> <p>25 Q Did you satisfy the debt that was owed to</p>
<p style="text-align: right;">Page 514</p> <p>1 A. Hanke</p> <p>2 A Yes, I do.</p> <p>3 Q Were you living in the Buckingham Court</p> <p>4 Apartments at the time?</p> <p>5 A No, my girlfriend at the time was.</p> <p>6 Q But you don't dispute that the eviction</p> <p>7 case was filed against you?</p> <p>8 A Not at all. I was the person that was on</p> <p>9 the lease. I moved back in with my parents at the</p> <p>10 time, after a relationship breakup. She stayed and</p> <p>11 didn't pay the rent by the agreement, and we got the</p> <p>12 eviction notice.</p> <p>13 Q And is it fair to say that Buckingham Court</p> <p>14 Apartments are in or around Chicago?</p> <p>15 A Crystal Lake, Illinois, sir.</p> <p>16 Q How far is Crystal Lake from Chicago?</p> <p>17 I should know that, but I'll ask you</p> <p>18 anyway.</p> <p>19 A An hour and a half train ride, 45 miles by</p> <p>20 car.</p> <p>21 Q North of the city?</p> <p>22 A Northwest.</p> <p>23 Q Do you recall, in October 1995, an entity</p> <p>24 called Dickerson & Associates sued your company</p> <p>25 IntelliCommunications Network?</p>	<p style="text-align: right;">Page 516</p> <p>1 A. Hanke</p> <p>2 the Dickerson & Associates?</p> <p>3 A That wasn't owed. That went to</p> <p>4 arbitration. I won that case. There was no --</p> <p>5 there was no remuneration due. It was a labor</p> <p>6 dispute.</p> <p>7 Q And the Frontier Communications West case</p> <p>8 against IntelliCommunications, did you satisfy the</p> <p>9 debt in that case?</p> <p>10 A That debt was actually purchased by MCI</p> <p>11 when Frontier Communications was bought out by that</p> <p>12 entity. And that was transferred on the books, if I</p> <p>13 remember correctly, to MCI.</p> <p>14 Q Do you recall that, in February of 1997, an</p> <p>15 entity called McHenry Industrial LP sued Hanke</p> <p>16 U. and IntelliCommunications Network?</p> <p>17 A I do.</p> <p>18 Q And that was a case in which the plaintiff</p> <p>19 won that case; they received the judgment?</p> <p>20 A They did, and we settled that. That was</p> <p>21 for the office space that IntelliCommunications</p> <p>22 rented at the time when we went out of business from</p> <p>23 MCI's default.</p> <p>24 Q Do you recall that individuals named Donald</p> <p>25 and Barbara Hartman sued you in March of 1997?</p>

<p style="text-align: right;">Page 517</p> <p>1 A. Hanke</p> <p>2 A They did.</p> <p>3 Q What ended up happening with that case?</p> <p>4 A That was also settled. That was a dispute</p> <p>5 from a down payment on a home that we didn't go</p> <p>6 through with. So, they wanted to keep the escrow</p> <p>7 money.</p> <p>8 We ended up settling that case.</p> <p>9 Q Do you recall that, in October 1997, Home</p> <p>10 State Bank and National Association sued you and</p> <p>11 IntelliCommunications Network for approximately</p> <p>12 \$103,000?</p> <p>13 A Yes.</p> <p>14 Q They obtained a judgment against you and</p> <p>15 the company?</p> <p>16 A Yes.</p> <p>17 Q Was that judgment ever satisfied?</p> <p>18 A No. That was included in my bankruptcy</p> <p>19 back then.</p> <p>20 Q When did you file for bankruptcy the first</p> <p>21 time?</p> <p>22 A I think it was in the mid '90s. I don't</p> <p>23 remember exactly what date it was.</p> <p>24 Q And when I say "the first time," you</p> <p>25 understand that you filed bankruptcy within the past</p>	<p style="text-align: right;">Page 519</p> <p>1 A. Hanke</p> <p>2 closing.</p> <p>3 Q What was the relationship between Chrysler</p> <p>4 Financial Corporation and IntelliCommunications?</p> <p>5 A It was a leased automobile for the company.</p> <p>6 Q Okay.</p> <p>7 Do you recall that, in December 1998, an</p> <p>8 entity called Sysco Food Services sued you and Kim</p> <p>9 Wideman?</p> <p>10 A Yes.</p> <p>11 Q And who is Kim Wideman?</p> <p>12 A My girlfriend at the time.</p> <p>13 Q Were you ever married?</p> <p>14 A No, sir.</p> <p>15 Q Have you ever been married before?</p> <p>16 A No, sir.</p> <p>17 Q When I say "before," from today --</p> <p>18 A No, sir. I've never been married.</p> <p>19 Q Do you have any children?</p> <p>20 A No, sir.</p> <p>21 Q Going back to the Sysco Food Services, do</p> <p>22 you recall that, in 1999, an approximate \$11,000</p> <p>23 judgment was issued against you and Ms. Wideman?</p> <p>24 A Yes.</p> <p>25 Q Was that judgment ever satisfied?</p>
<p style="text-align: right;">Page 518</p> <p>1 A. Hanke</p> <p>2 year in the Northern District of Illinois, correct?</p> <p>3 A Correct.</p> <p>4 Q That was the second time that you had filed</p> <p>5 for bankruptcy?</p> <p>6 A Yes.</p> <p>7 Q Was there any other time?</p> <p>8 A No, sir.</p> <p>9 Q Did you disclose to the bankruptcy court</p> <p>10 last year that you had filed for bankruptcy</p> <p>11 previously?</p> <p>12 A Yes.</p> <p>13 Q Do you recall that, in February of 1998, an</p> <p>14 entity called Chrysler Financial Corporation sued</p> <p>15 you?</p> <p>16 I'll stop there.</p> <p>17 A Sorry, sir?</p> <p>18 Q I'll withdraw that. I'll ask that again.</p> <p>19 Do you recall, in February of 1998,</p> <p>20 Chrysler Financial Corporation sought a</p> <p>21 approximately \$8,000 judgment against you?</p> <p>22 A I do.</p> <p>23 Q Was that judgment ever satisfied?</p> <p>24 A That was part of the bankruptcy. All of</p> <p>25 that was involved with the IntelliCommunications</p>	<p style="text-align: right;">Page 520</p> <p>1 A. Hanke</p> <p>2 A I think it was.</p> <p>3 Q Okay.</p> <p>4 What was the claim there?</p> <p>5 A I leased a portion of a restaurant and</p> <p>6 tavern. I had the food side. I did not control the</p> <p>7 liquor side. That tavern closed, and we were out of</p> <p>8 business within three days.</p> <p>9 Q Where was that located?</p> <p>10 A Crystal Lake, Illinois.</p> <p>11 Q Have you ever lived anywhere else other</p> <p>12 than Crystal Lake, Illinois?</p> <p>13 A I did have a short time in Farmingdale,</p> <p>14 Long Island, for about six months. I lived in</p> <p>15 Walker, Minnesota, for a short period of time. But</p> <p>16 mostly right here in Illinois.</p> <p>17 Q And what were you doing in Farmingdale, New</p> <p>18 York?</p> <p>19 A I was living with a friend of mine, working</p> <p>20 out of Fort Lee, New Jersey and, during the time</p> <p>21 when the debit and credit cards were a popular item,</p> <p>22 selling those into the New York market and</p> <p>23 recruiting people to sell those.</p> <p>24 Q Was that separate and apart from your time</p> <p>25 obtaining your degree from the Culinary Institute?</p>

<p style="text-align: right;">Page 529</p> <p>1 A. Hanke</p> <p>2 you filed a false police report still pending?</p> <p>3 A I didn't know there was a litigation about</p> <p>4 a false police report, sir. Excuse me. I didn't</p> <p>5 know there was. I had no idea.</p> <p>6 There is no litigation pending whatsoever</p> <p>7 with Mr. Lillie, that I'm aware of.</p> <p>8 Q Since the settlement?</p> <p>9 A Yes, sir.</p> <p>10 Q Are you familiar with an entity called</p> <p>11 Hands in Hand, LLC?</p> <p>12 A Yes.</p> <p>13 Q And what's in Hands in Hand, LLC?</p> <p>14 A That was an LLC started to -- during the</p> <p>15 pandemic era to do business in test kits and hand</p> <p>16 sanitizer.</p> <p>17 Q And you formed that entity with Mr. Richard</p> <p>18 Presley?</p> <p>19 A Yes, sir.</p> <p>20 Q And it was formed in Wyoming in 2000 and --</p> <p>21 in May of 2020?</p> <p>22 A I don't remember the date, but it was in</p> <p>23 Wyoming, yes.</p> <p>24 Q Well, we all know, because I think it's</p> <p>25 emblazoned in our minds, that the pandemic started</p>	<p style="text-align: right;">Page 531</p> <p>1 A. Hanke</p> <p>2 dollar amount, of that one sale?</p> <p>3 A It was -- it was 20,000, I think, or</p> <p>4 something like that. It was one pallet of hand</p> <p>5 sanitizer, or two pallets, something like that. I</p> <p>6 don't remember right now.</p> <p>7 Q Was the entity paid for that?</p> <p>8 A Yes, sir.</p> <p>9 Q Did the entity pay taxes on the receipt of</p> <p>10 that?</p> <p>11 A They would have paid taxes on any profits</p> <p>12 that were received. But, actually, we ended up</p> <p>13 losing money on that particular transaction.</p> <p>14 Q Are there financial statements of that</p> <p>15 entity?</p> <p>16 A Not that I kept, no.</p> <p>17 Q Were they ever prepared?</p> <p>18 A Not that I'm aware of.</p> <p>19 Q Do you know if the entity engaged in</p> <p>20 business after December 31, 2020, or was it just</p> <p>21 a --</p> <p>22 A I have idea.</p> <p>23 Q -- five-, six-month thing?</p> <p>24 A Yeah, I don't -- you know, I don't think</p> <p>25 so.</p>
<p style="text-align: right;">Page 530</p> <p>1 A. Hanke</p> <p>2 late February or early March of 2020.</p> <p>3 A Sure.</p> <p>4 Q So, is it fair to say that the entity was</p> <p>5 formed after we all learned that we were in an</p> <p>6 epidemic?</p> <p>7 A Yes, sir.</p> <p>8 Q And is that entity still in business?</p> <p>9 A It is not.</p> <p>10 Q Does it remain active as a corporate</p> <p>11 entity?</p> <p>12 A Not that I'm aware of. I think the same as</p> <p>13 in Illinois. If you don't do the corporate</p> <p>14 documents every year in Wyoming, it just goes</p> <p>15 dormant.</p> <p>16 Q And with respect to the corporate</p> <p>17 structure, were you and Mr. Presley equal members of</p> <p>18 the LLC?</p> <p>19 A Yes.</p> <p>20 Q 50/50?</p> <p>21 A Yes, sir.</p> <p>22 Q Did Hands in Hand ever engage a sale of</p> <p>23 PPP?</p> <p>24 A Hand sanitizer and only one sale.</p> <p>25 Q What was the -- what was the volume, in</p>	<p style="text-align: right;">Page 532</p> <p>1 A. Hanke</p> <p>2 Q Do you know an entity by the name of Vortex</p> <p>3 Environmental Alternatives, LLC?</p> <p>4 A I sure do.</p> <p>5 Q And what's that entity?</p> <p>6 A That's a waste-to-energy company.</p> <p>7 Q And that was formed in Florida in May of</p> <p>8 2019?</p> <p>9 A Yes, sir.</p> <p>10 Q And it was dissolved in October 2020?</p> <p>11 A I don't know when it was dissolved.</p> <p>12 Q And that is an entity in which you had some</p> <p>13 relationship with Amy Roy-Haeger?</p> <p>14 A I sure did.</p> <p>15 Yeah. She brought the gentleman who had a</p> <p>16 waste-to-energy technology to the table, who was</p> <p>17 looking for an investment to get this project</p> <p>18 started in a manufacturing standpoint and to sell</p> <p>19 this product to developing countries.</p> <p>20 Q And do you know -- do you remember his</p> <p>21 name?</p> <p>22 A I'm really bad at remembering names, I'm</p> <p>23 sorry. If I was reminded of it, I would be more</p> <p>24 than happy to tell you if it was right, but I --</p> <p>25 Q That's okay.</p>

<p style="text-align: right;">Page 533</p> <p>1 A. Hanke</p> <p>2 A -- do not --</p> <p>3 Q We'll get it. I have it in the files.</p> <p>4 A Okay.</p> <p>5 Q Do you recall, in February and March of</p> <p>6 2020, you reserved two N-numbers with the Federal</p> <p>7 Aviation Administration?</p> <p>8 A Yes.</p> <p>9 Q What's an N-number?</p> <p>10 A It's the November -- architecture of the</p> <p>11 number that goes on the tail of an airplane.</p> <p>12 Q Do those N-numbers currently have any</p> <p>13 aircraft associated with them?</p> <p>14 A No, not at all.</p> <p>15 Q Do you know that a gentleman by the name of</p> <p>16 Donald -- do you know a gentleman by the name of</p> <p>17 Donald Cahalan or --</p> <p>18 A Say again, sir? Donald?</p> <p>19 Q Let me withdraw that.</p> <p>20 Do you know that, in or around</p> <p>21 November 2016, a judgment was filed against you in</p> <p>22 the amount of \$104,000 in McHenry County by a</p> <p>23 gentleman by the name of Donald Cahalan?</p> <p>24 A Donald Cahalan? Yes, sir.</p> <p>25 Q It's Cahalan, C-A-H-A-L-A-N, for the court</p>	<p style="text-align: right;">Page 535</p> <p>1 A. Hanke</p> <p>2 partners in EZ Credit Financing?</p> <p>3 A Yes, sir.</p> <p>4 Q Which is an entity that was formerly known</p> <p>5 as Getting There Financial, Inc.?</p> <p>6 A It was at first, yes.</p> <p>7 Q And that was formed in Wyoming in February</p> <p>8 of 2013; am I correct?</p> <p>9 A Yes, sir.</p> <p>10 Q And that entity was formed to run a</p> <p>11 no-credit-check, rent-to-own program in the wireless</p> <p>12 industry; is that correct?</p> <p>13 A Not just wireless, but electronics.</p> <p>14 Q And EZ Credit Financing, Inc., looks like,</p> <p>15 to me, as a C corporation; is that right?</p> <p>16 A That's correct.</p> <p>17 I think it was a Subchapter S by election.</p> <p>18 Q Fair enough.</p> <p>19 But in terms of the equity, how was the</p> <p>20 equity split between Mr. Cahalan, Mr. Thompson,</p> <p>21 yourself, and perhaps others?</p> <p>22 A Yeah. I think, at the time, it was all of</p> <p>23 us an equal share, 33 and a third.</p> <p>24 Q Got it.</p> <p>25 And is it fair to say that Mr. Cahalan and</p>
<p style="text-align: right;">Page 534</p> <p>1 A. Hanke</p> <p>2 reporter, I think?</p> <p>3 A Correct.</p> <p>4 Q Has that judgment been satisfied?</p> <p>5 A That was actually -- I'm not sure what the</p> <p>6 technical legal term is, but it's been removed.</p> <p>7 Q And what did Mr. Cahalan claim in</p> <p>8 connection with obtaining the judgment?</p> <p>9 A He claimed, at the time, that he was owed</p> <p>10 funds relational to an investment he made in the</p> <p>11 first version of IOLO or the Free Phone Project.</p> <p>12 Q And the first version of IOLO, would that</p> <p>13 be EZ Credit Financing, Inc.?</p> <p>14 A Yes, sir.</p> <p>15 Q We'll get there in a moment.</p> <p>16 A All right.</p> <p>17 Q Also, in 2016, am I correct that a</p> <p>18 gentleman by the name of James Thompson filed a</p> <p>19 judgment against you in the approximate amount of</p> <p>20 \$103,000?</p> <p>21 A Those two -- the two -- the three of us</p> <p>22 were partners, and those two judgments came at the</p> <p>23 same time, but they were both settled or released.</p> <p>24 Q And so, when you say the three of you were</p> <p>25 partners, you were -- you -- the three of you were</p>	<p style="text-align: right;">Page 536</p> <p>1 A. Hanke</p> <p>2 Mr. Thompson brought actions against you in</p> <p>3 connection with a dispute over the operation of EZ</p> <p>4 Credit Financing?</p> <p>5 A No, they didn't bring any action at all.</p> <p>6 They did file a claim against it, but not against</p> <p>7 the operations.</p> <p>8 Q And what was the nature of their claim, I</p> <p>9 should ask?</p> <p>10 A I'm sorry. Sir, I didn't hear you.</p> <p>11 Q Sorry.</p> <p>12 What was the nature of the claim?</p> <p>13 A Just that they felt that they were owed</p> <p>14 their money back after the investment, and it was</p> <p>15 determined later that they, you know -- an</p> <p>16 investment was an investment, that they couldn't do</p> <p>17 that. That's why it was dropped.</p> <p>18 Q Got it.</p> <p>19 Now, there came a point in time when EZ</p> <p>20 Credit Financing turned into IOLO; is that correct?</p> <p>21 A Yes.</p> <p>22 Q And there are multiple IOLO entities?</p> <p>23 IOLO Advisors LLC, correct?</p> <p>24 A Yes, sir.</p> <p>25 Q And that was formed in Wyoming in December</p>

<p style="text-align: right;">Page 537</p> <p>1 A. Hanke</p> <p>2 of 2018?</p> <p>3 A Yes.</p> <p>4 Q And it remains active?</p> <p>5 A Not that I'm aware of. Again, it hasn't</p> <p>6 been paid or...</p> <p>7 Q And at the time that EZ Credit became IOLO,</p> <p>8 was there a change in the ownership structure of the</p> <p>9 entity?</p> <p>10 A I don't think there was. I think it just</p> <p>11 remained the same.</p> <p>12 Q Meaning that IOLO was owned in thirds by</p> <p>13 you, Mr. Cahalan, and Mr. Thompson?</p> <p>14 A When we changed -- when EZ Credit Financing</p> <p>15 was changed, a lot of things changed with it. We</p> <p>16 had new investors. The technology changed, the</p> <p>17 software changed, all of that changed.</p> <p>18 We ended up closing the one business and</p> <p>19 basically beginning a new business.</p> <p>20 Q And in connection with the new business,</p> <p>21 what was the nature of the new business for IOLO?</p> <p>22 A Similar products and services but with</p> <p>23 different technology. We used stores and brokers to</p> <p>24 elicit the customers instead of just -- and the</p> <p>25 Internet website, those types of things,</p>	<p style="text-align: right;">Page 539</p> <p>1 A. Hanke</p> <p>2 A There was no acronym for it at all. I just</p> <p>3 came up with the name.</p> <p>4 Matter of fact, we didn't even come up with</p> <p>5 it; somebody in New York did, so...</p> <p>6 Q Who was that?</p> <p>7 A I think it was a gentleman that worked at</p> <p>8 Sheridan Capital, if I remember correctly.</p> <p>9 Q Did EZ Credit Financing have financial</p> <p>10 statements?</p> <p>11 A I don't remember if they were created for</p> <p>12 there or not.</p> <p>13 Q Balance sheet?</p> <p>14 A They didn't do any revenue, so I don't</p> <p>15 think any were created for that particular entity.</p> <p>16 Q No income statement?</p> <p>17 A Again, I don't remember. I would have to</p> <p>18 look back to see.</p> <p>19 Q Which reminds me, are you registered with</p> <p>20 the Securities and Exchange Commission as a broker?</p> <p>21 A No, sir.</p> <p>22 Q Or a broker-dealer?</p> <p>23 A No, sir.</p> <p>24 Q So, the IOLO business that was in the -- in</p> <p>25 the rent-to-own program, did that entity have any</p>
<p style="text-align: right;">Page 538</p> <p>1 A. Hanke</p> <p>2 pay-for-click, more technology-driven.</p> <p>3 Q And was EZ Credit Financing -- before it</p> <p>4 turned into IOLO, was that a profitable entity?</p> <p>5 A No.</p> <p>6 Q Did it have any revenue?</p> <p>7 A No.</p> <p>8 Q I guess it stands to reason it wouldn't</p> <p>9 have profits, either, if it doesn't have revenue?</p> <p>10 A Yes.</p> <p>11 Q And then the entity -- the IOLO entity,</p> <p>12 which continued the same business with somewhat</p> <p>13 different technology, what was the name of that</p> <p>14 entity?</p> <p>15 A That was it. It was IOLO.</p> <p>16 Q Was that IOLO Holdings, IOLO Global, IOLO</p> <p>17 Advisors?</p> <p>18 A None of those. It was just IOLO.</p> <p>19 Q Just IOLO.</p> <p>20 And according to its website, IOLO stands</p> <p>21 for "I Only Live Once"; is that correct?</p> <p>22 A No. And I didn't know -- even know it had</p> <p>23 a website.</p> <p>24 Q So, your testimony is IOLO does not mean "I</p> <p>25 Only Live Once"?</p>	<p style="text-align: right;">Page 540</p> <p>1 A. Hanke</p> <p>2 financial statements?</p> <p>3 A Yes.</p> <p>4 Q It had an income statement and balance</p> <p>5 sheet?</p> <p>6 A Yes.</p> <p>7 Q And did it have any revenue?</p> <p>8 A Yes.</p> <p>9 Q Did it make any profit?</p> <p>10 A No. That's why it was eventually shut</p> <p>11 down.</p> <p>12 Q And do you maintain the financial</p> <p>13 statements of that IOLO?</p> <p>14 A I don't know if I still have them or not.</p> <p>15 Q Did there come a point in time when you</p> <p>16 established IOLO Global?</p> <p>17 A Yes. It's -- it formed.</p> <p>18 Q And that was formerly known as the Discover</p> <p>19 Financial Group, LLC?</p> <p>20 A It was.</p> <p>21 Q All right.</p> <p>22 And were you an owner in Discover Financial</p> <p>23 Group, LLC?</p> <p>24 A No, sir.</p> <p>25 Q Who -- who were the owners of that?</p>

<p style="text-align: right;">Page 541</p> <p>1 A. Hanke</p> <p>2 A It wasn't. It was just a company formed by</p> <p>3 the company corporation in Wyoming prior to its</p> <p>4 purchase and the name change.</p> <p>5 Q Could you just repeat that? I missed that.</p> <p>6 It was formed --</p> <p>7 A It was a company formed in Wyoming prior to</p> <p>8 my purchasing it.</p> <p>9 Q Got it.</p> <p>10 And who formed it?</p> <p>11 A I think Wyoming Company Corporation did.</p> <p>12 Q And you acquired that LLC?</p> <p>13 A Yes, sir.</p> <p>14 Q Did you pay consideration for that?</p> <p>15 A Can you rephrase the question?</p> <p>16 Q Did you pay any money for acquiring</p> <p>17 Discover Financial Group, LLC?</p> <p>18 A Yes.</p> <p>19 Q What was -- what was the consideration for</p> <p>20 that transaction that you paid?</p> <p>21 A It was a couple hundred dollars.</p> <p>22 Q Who did you pay it to?</p> <p>23 A The Wyoming Company Corporation.</p> <p>24 Q Do you know when you acquired Discover</p> <p>25 Financial Group, LLC?</p>	<p style="text-align: right;">Page 543</p> <p>1 A. Hanke</p> <p>2 How do you explain that?</p> <p>3 A I can't. I have five or six of those IOLO</p> <p>4 entities; Advisors, Global -- several of them -- all</p> <p>5 under the heading of IOLO Holdings.</p> <p>6 So, I'm not trying to misrepresent, but</p> <p>7 thanks for reminding me.</p> <p>8 Q Okay. Thanks. Thanks. That's helpful.</p> <p>9 So, let's talk about IOLO Holdings LLC.</p> <p>10 A Okay.</p> <p>11 Q Is it your testimony that IOLO Global LLC</p> <p>12 is a subsidiary of IOLO Holdings LLC?</p> <p>13 A Yes.</p> <p>14 Q And do you have an organizational chart</p> <p>15 that describes the relationship between the IOLO</p> <p>16 entities?</p> <p>17 A Not an organizational chart.</p> <p>18 I think, during the discovery process, I</p> <p>19 provided the corporate documents for those entities.</p> <p>20 Q And IOLO Holdings was formed in Wyoming in</p> <p>21 or around December 2018, correct?</p> <p>22 A Yes, sir.</p> <p>23 Q And that entity remains active?</p> <p>24 A I don't think it's active, either, for the</p> <p>25 same reasons I mentioned before about the others.</p>
<p style="text-align: right;">Page 542</p> <p>1 A. Hanke</p> <p>2 A I do not.</p> <p>3 Q What was the business of IOLO Global LLC at</p> <p>4 the time it was formed?</p> <p>5 A It didn't do any business.</p> <p>6 Q And it doesn't do any business today?</p> <p>7 A No, sir.</p> <p>8 Q It's never done any business?</p> <p>9 A No, sir. I think I formed that entity</p> <p>10 in -- with anticipation of doing some business. I</p> <p>11 don't think I ever put anything underneath it.</p> <p>12 Q Were you the only owner of that business?</p> <p>13 A Yes, sir.</p> <p>14 Q That was separate and apart from the IOLO</p> <p>15 that came out of the EZ Credit, right?</p> <p>16 A Yes, sir.</p> <p>17 Q So, we're going to get -- during the course</p> <p>18 of the day, we're going to get to the point where</p> <p>19 we're talking about the management and deposit</p> <p>20 agreement between Mr. Al-Thani and IOLO Global LLC.</p> <p>21 A Okay.</p> <p>22 Q And I'm trying to, in my head, square your</p> <p>23 answer that IOLO Global never did any business with</p> <p>24 the fact that it entered into a contract with my</p> <p>25 client.</p>	<p style="text-align: right;">Page 544</p> <p>1 A. Hanke</p> <p>2 Q Do you know if the Wyoming Secretary of</p> <p>3 State's files have been updated based on the</p> <p>4 business of IOLO Holdings or IOLO Global at this</p> <p>5 time?</p> <p>6 A I don't know, sir. I haven't looked.</p> <p>7 Q Okay.</p> <p>8 Did you use counsel to incorporate these</p> <p>9 entities in Wyoming?</p> <p>10 A No, sir.</p> <p>11 Q And with respect to IOLO Holdings LLC, are</p> <p>12 you the only owner of that entity?</p> <p>13 A Yes, sir.</p> <p>14 Q It has no employees, correct?</p> <p>15 A None.</p> <p>16 Q It does not have a board of directors,</p> <p>17 correct?</p> <p>18 A Correct.</p> <p>19 Q All management decisions of IOLO Holdings</p> <p>20 LLC are made by you, correct?</p> <p>21 A Yes, sir.</p> <p>22 Q Does IOLO Holdings LLC prepare financial</p> <p>23 statements?</p> <p>24 A It has not yet.</p> <p>25 Q And when I mean "financial statements," you</p>

<p style="text-align: right;">Page 545</p> <p>1 A. Hanke</p> <p>2 know that I mean a balance sheet and an income</p> <p>3 statement, correct?</p> <p>4 A I do.</p> <p>5 Q You're aware what those terms mean?</p> <p>6 A Yes.</p> <p>7 Q With respect to IOLO Global LLC, you're the</p> <p>8 only owner, correct?</p> <p>9 A Yes.</p> <p>10 Q It doesn't have a board of directors,</p> <p>11 correct?</p> <p>12 A Correct.</p> <p>13 Q It doesn't have any other shareholders,</p> <p>14 correct?</p> <p>15 A Correct.</p> <p>16 Q You make all the management decisions for</p> <p>17 IOLO Global LLC, correct?</p> <p>18 A Correct.</p> <p>19 Q With respect to IOLO Holdings LLC and IOLO</p> <p>20 Global LLC, it does not have a business address --</p> <p>21 strike that.</p> <p>22 It does not have an office in which</p> <p>23 business operations are done?</p> <p>24 A None, other than my home office, no.</p> <p>25 Q So, all of the business of IOLO Holdings</p>	<p style="text-align: right;">Page 547</p> <p>1 A. Hanke</p> <p>2 THE WITNESS: Very good.</p> <p>3 THE VIDEOGRAPHER: All right. We are going</p> <p>4 off the record. The time is 10:48 a.m.</p> <p>5 (Recess taken.)</p> <p>6 THE VIDEOGRAPHER: We are going back on the</p> <p>7 record. The time is 10:58 a.m.</p> <p>8 BY MR. HEFTER:</p> <p>9 Q Going back to IOLO Global and IOLO</p> <p>10 Holdings --</p> <p>11 Mr. Hanke, can you hear me?</p> <p>12 A I can, sir.</p> <p>13 Q Okay.</p> <p>14 Do those entities maintain bank accounts?</p> <p>15 A There were bank accounts opened at PNC</p> <p>16 during that time, but I think they're all closed</p> <p>17 now.</p> <p>18 Q And the accounts at PNC, were they in the</p> <p>19 name of IOLO Holdings LLC and/or IOLO Global LLC?</p> <p>20 A I think there was one of each.</p> <p>21 Q And do you have a personal account at PNC</p> <p>22 Bank?</p> <p>23 A I do.</p> <p>24 Q And you do, and you had one during the time</p> <p>25 of 2020, around?</p>
<p style="text-align: right;">Page 546</p> <p>1 A. Hanke</p> <p>2 LLC and IOLO Global LLC are done at your home in</p> <p>3 Crystal Lake, Illinois, correct?</p> <p>4 A Yes.</p> <p>5 Q In connection with this litigation, IOLO</p> <p>6 Global LLC does not have counsel, correct?</p> <p>7 A Correct.</p> <p>8 Q You have not sought to substitute counsel</p> <p>9 after Mr. Herndon's withdrawal in this case,</p> <p>10 correct?</p> <p>11 A Correct.</p> <p>12 Q IOLO Holdings LLC does not have independent</p> <p>13 counsel, correct?</p> <p>14 A Correct.</p> <p>15 Q With respect to IOLO Advisors LLC, that</p> <p>16 entity is operated by you solely, correct?</p> <p>17 A Yes.</p> <p>18 Q You're the -- you're the only owner?</p> <p>19 A Yes.</p> <p>20 Q The only manager?</p> <p>21 A Yes.</p> <p>22 Q It has no employees?</p> <p>23 A Correct.</p> <p>24 MR. HEFTER: Why don't we take a</p> <p>25 five-minute break.</p>	<p style="text-align: right;">Page 548</p> <p>1 A. Hanke</p> <p>2 A At some point, we moved from Woodforest</p> <p>3 National Bank to PNC Bank. I just don't remember</p> <p>4 when that was.</p> <p>5 Q So, we know in the record that you had</p> <p>6 multiple meetings with representatives of Sheikh</p> <p>7 Mohammed in this case, right?</p> <p>8 A They said they were, yes.</p> <p>9 Q Is it your testify -- testimony that you</p> <p>10 didn't travel to New York to meet with the Sheikh in</p> <p>11 this case?</p> <p>12 A Is that a question, sir? I'm sorry.</p> <p>13 Q I think it's a question, yeah.</p> <p>14 A Could you ask me again?</p> <p>15 Q Sure.</p> <p>16 Is it your testimony that you did not</p> <p>17 travel to New York to meet with Sheikh Mohammed at</p> <p>18 the -- at the Ritz-Carlton hotel on Central Park</p> <p>19 South in New York City?</p> <p>20 A I met with somebody there, sir. I'm not</p> <p>21 sure if that was the gentleman or not. I did not</p> <p>22 ask for an ID.</p> <p>23 Q Okay.</p> <p>24 So, we've established that you traveled to</p> <p>25 New York, correct?</p>

<p style="text-align: right;">Page 669</p> <p>1 A. Hanke</p> <p>2 A It doesn't refresh my memory, but, again,</p> <p>3 sir, I'm not disputing meeting him. I just don't</p> <p>4 remember the dates.</p> <p>5 Q Okay.</p> <p>6 Let's mark as 56 an email exchange between</p> <p>7 Mr. Hanke and Mr. Miginnis on or about June 20,</p> <p>8 2019.</p> <p>9 A Sorry, sir. What number are we looking at?</p> <p>10 I'm sorry. 56?</p> <p>11 Q Fifty-six.</p> <p>12 (PLF00000890 through 891 was</p> <p>13 marked as Exhibit 56 for</p> <p>14 identification, as of this</p> <p>15 date.)</p> <p>16 A Okay, sir. I have it up.</p> <p>17 BY MR. HEFTER:</p> <p>18 Q Okay.</p> <p>19 As I said, this is a document bearing a</p> <p>20 Bates number PLF 890, and it's an email exchange on</p> <p>21 or about June 20, 2019, between Mr. Miginnis and</p> <p>22 Mr. Hanke.</p> <p>23 Have you seen this document before?</p> <p>24 A Yes.</p> <p>25 Q And in the email to Mr. Hanke, after you</p>	<p style="text-align: right;">Page 671</p> <p>1 A. Hanke</p> <p>2 A No, sir. That's what I was told by Amy</p> <p>3 Roy-Haeger and Jonathan Cannon both, that had the</p> <p>4 two largest contracts.</p> <p>5 Q So, what you're relying upon is the</p> <p>6 representations of Ms. Roy-Haeger and Mr. Cannon</p> <p>7 that the initial payment will be processed no later</p> <p>8 than July 5th, 2019?</p> <p>9 A Absolutely. I have to rely on the contract</p> <p>10 holders to supply me the information necessary.</p> <p>11 Q Okay.</p> <p>12 And that was the only thing that you relied</p> <p>13 upon in telling Mr. Miginnis that you have confirmed</p> <p>14 that the initial payment will be processed no later</p> <p>15 than July 5, 2019?</p> <p>16 A That's not the only thing. That is the</p> <p>17 thing. That is the major thing. I have to rely</p> <p>18 upon the information gathered from those contract</p> <p>19 holders.</p> <p>20 Q And so, you did nothing else before</p> <p>21 confirming that statement to Mr. Miginnis?</p> <p>22 A I'm not sure I understand the question,</p> <p>23 sir.</p> <p>24 Q I'll move on.</p> <p>25 Let me -- let me mark as Hanke Exhibit 57 a</p>
<p style="text-align: right;">Page 670</p> <p>1 A. Hanke</p> <p>2 say, "Apologize for the slight delay while I was not</p> <p>3 feeling well," you say, "I'm happy to provide you</p> <p>4 with the Addendum for Mr. Al Thani according to your</p> <p>5 direction."</p> <p>6 Do you see that?</p> <p>7 A Yes, sir.</p> <p>8 Q And the addendum was a document, an</p> <p>9 agreement, in which the deposit would be increased</p> <p>10 and there would be adjustment to the payout</p> <p>11 schedule, correct?</p> <p>12 A Yes, sir.</p> <p>13 Q Now, you also say "Additionally, I have</p> <p>14 confirmed that the initial Payment will be processed</p> <p>15 no later than July 5, 2019 or sooner if able."</p> <p>16 Now, the initial payment that you're</p> <p>17 referring to is the additional payment that was due</p> <p>18 20 international business days after the receipt of</p> <p>19 Mr. Al-Thani's funds, correct?</p> <p>20 A Yes, sir.</p> <p>21 Q And that never happened?</p> <p>22 A Correct.</p> <p>23 Q And when you say "I have confirmed that the</p> <p>24 initial Payment will be processed no later than</p> <p>25 July 5th," that was a false statement, correct?</p>	<p style="text-align: right;">Page 672</p> <p>1 A. Hanke</p> <p>2 document entitled "Addendum #1 to an existing MDA."</p> <p>3 A Okay, sir. I have it up.</p> <p>4 MR. HEFTER: Wrong document.</p> <p>5 MR. O'BRIEN: My apologies. Just a moment.</p> <p>6 BY MR. HEFTER:</p> <p>7 Q While the document is being pulled up, at</p> <p>8 the May 30, 2019, meeting at the Bailey with you and</p> <p>9 Mr. Papi, you assured them that Mr. Al-Thani's</p> <p>10 investment was safe, correct?</p> <p>11 A I think every time Mr. Papi or Mr. Miginnis</p> <p>12 and I met, regardless, it was for an update. Safety</p> <p>13 wasn't always an issue; it was a payment. That's</p> <p>14 what we were all waiting for.</p> <p>15 Q And you assured them at those meetings --</p> <p>16 at that meeting that a payment was imminent?</p> <p>17 A As I was being assured by my contract</p> <p>18 holders that it was, as well.</p> <p>19 Q You represented to them that a payment was</p> <p>20 imminent, correct?</p> <p>21 A Absolutely.</p> <p>22 Q Let's turn to the addendum.</p> <p>23 (PLF00000192 through 193 was</p> <p>24 marked as Exhibit 57 for</p> <p>25 identification, as of this</p>

46 (Pages 669 - 672)

<p style="text-align: right;">Page 549</p> <p>1 A. Hanke</p> <p>2 A Yes, sir.</p> <p>3 Q And in that meeting, you discussed my</p> <p>4 client's investment, correct?</p> <p>5 A In that meeting, we discussed an</p> <p>6 investment, yes. I'm not sure if it was with your</p> <p>7 client, though.</p> <p>8 Q Okay.</p> <p>9 With respect to the -- and you had to take</p> <p>10 an airplane to get there, right?</p> <p>11 A Yes, sir, I did.</p> <p>12 Q Right.</p> <p>13 And you had to take a taxicab from the</p> <p>14 airport to Midtown Manhattan, correct?</p> <p>15 A I did.</p> <p>16 Q With respect to the expenses that related</p> <p>17 to that business that you had in New York, out of</p> <p>18 what bank account did those expenses come from,</p> <p>19 IOLO's or your personal bank account?</p> <p>20 A Probably my personal account.</p> <p>21 Q Did you ever submit an expense</p> <p>22 reimbursement form to IOLO Holdings or IOLO Global</p> <p>23 when you were traveling on business with respect to</p> <p>24 IOLO's business?</p> <p>25 A No.</p>	<p style="text-align: right;">Page 551</p> <p>1 A. Hanke</p> <p>2 Q Got it.</p> <p>3 Speaking of automobiles, do you still drive</p> <p>4 a 2015 GMC Yukon Denali?</p> <p>5 A No, sir.</p> <p>6 Q What happened to that vehicle?</p> <p>7 A It got repossessed when this proceeding</p> <p>8 started, during my bankruptcy.</p> <p>9 Q Do you still drive a 2018 Cadillac CT6?</p> <p>10 A No, sir.</p> <p>11 Q What happened to that vehicle?</p> <p>12 A That got repossessed due to these</p> <p>13 proceedings and my bankruptcy.</p> <p>14 Q And do you still own or drive two 2016</p> <p>15 Mercedes-Benzen GL450s?</p> <p>16 A I never did.</p> <p>17 Q Did you ever own any Mercedes?</p> <p>18 A No. They were licensed to me, never titled</p> <p>19 to me. They were bought and purchased by another</p> <p>20 entity. I was just a broker in the sale of the two</p> <p>21 cars.</p> <p>22 Q Was there ever a period of time -- before</p> <p>23 we get off bank accounts, do you own any securities</p> <p>24 accounts?</p> <p>25 A No.</p>
<p style="text-align: right;">Page 550</p> <p>1 A. Hanke</p> <p>2 Q Is it fair to say that all of the expenses</p> <p>3 that you incurred as a result of that business came</p> <p>4 out of your personal bank accounts?</p> <p>5 A That would be a fair statement.</p> <p>6 Q Do you know the most amount of cash that</p> <p>7 the bank accounts of IOLO Holdings LLC or IOLO</p> <p>8 Global LLC ever had?</p> <p>9 A I do not, sir.</p> <p>10 Q Do you know an entity called Tiderco,</p> <p>11 T-I-D-E-R-C-O, LLC?</p> <p>12 A I do.</p> <p>13 Q And that was formed in Wyoming in 2015?</p> <p>14 A Yes.</p> <p>15 Q What was the business of Tiderco?</p> <p>16 A It didn't do any business.</p> <p>17 Q What was its intended purpose?</p> <p>18 A We were going to go into the lease-to-own</p> <p>19 automobile business at the time, but it never panned</p> <p>20 out.</p> <p>21 Q Who is "we"?</p> <p>22 A Myself and a business partner.</p> <p>23 Q Who is that?</p> <p>24 A The same guy, Donald Cahalan and Jim</p> <p>25 Thompson.</p>	<p style="text-align: right;">Page 552</p> <p>1 A. Hanke</p> <p>2 Q Like any -- a brokerage account, if that</p> <p>3 was not -- unclear?</p> <p>4 A No, I do not.</p> <p>5 Q Do you own any publicly traded securities?</p> <p>6 A No.</p> <p>7 Q Was there -- did there come a point in time</p> <p>8 that you owned class B shares in an entity called</p> <p>9 PNG Telecommunications?</p> <p>10 A Back in the early '90s, yes.</p> <p>11 Q And is it fair to say that, in 2001, you</p> <p>12 were sued in Illinois in connection with the conduct</p> <p>13 of a Mr. August Ghilarducci?</p> <p>14 A I don't remember that or had any part in</p> <p>15 that suit. I think that was dropped.</p> <p>16 Q You don't remember any of the details of</p> <p>17 the litigation brought by an individual named Steven</p> <p>18 Holt -- Holtz?</p> <p>19 A Yeah. It was -- was a dispute from a</p> <p>20 shareholder of a company that I bought into. It was</p> <p>21 all previous to my getting involved there. I was</p> <p>22 only named by -- because I was on the company at the</p> <p>23 time, but that was all dropped or paid. I had</p> <p>24 nothing to do with it.</p> <p>25 Q You're aware that Mr. Ghilarducci was</p>


<p style="text-align: right;">Page 745</p> <p>1 A. Hanke</p> <p>2 Ms. Roy-Haeger?</p> <p>3 A Or Mr. Hubner to Ms. Haeger.</p> <p>4 Q Let's move on.</p> <p>5 Let me mark for identification a document,</p> <p>6 Exhibit Hanke Exhibit 77, which is a document</p> <p>7 bearing the Bates numbers AH_094275 [sic] to</p> <p>8 AH_094340.</p> <p>9 (AH_094257 through 340 was</p> <p>10 marked as Exhibit 77 for</p> <p>11 identification, as of this</p> <p>12 date.)</p> <p>13 BY MR. HEFTER:</p> <p>14 Q Has that popped up yet?</p> <p>15 A It just did, sir.</p> <p>16 Q Okay. Great.</p> <p>17 So, this is a file that reflects text</p> <p>18 messages between you and Mr. Mills Rogers --</p> <p>19 A Okay.</p> <p>20 Q -- between July 2017 and October of 2020.</p> <p>21 A Okay.</p> <p>22 Q Do you know when you first started working</p> <p>23 with Mr. Mills Rogers?</p> <p>24 A I would guess somewhere around July of</p> <p>25 2017. I couldn't -- I wouldn't know exactly.</p>	<p style="text-align: right;">Page 747</p> <p>1 A. Hanke</p> <p>2 Q Was that business run out of IOLO?</p> <p>3 A Good question.</p> <p>4 No, it was not.</p> <p>5 Q What entity was involved in those</p> <p>6 transactions?</p> <p>7 A Some of them are through Bala Trading.</p> <p>8 But other than that, they're all individual</p> <p>9 broker deals that would have just come</p> <p>10 commission-wise.</p> <p>11 Q Okay.</p> <p>12 And then Mr. Mills Rogers says, in response</p> <p>13 [as read], "I have a box in Miami trying to reach</p> <p>14 holder now. Please stand by."</p> <p>15 A Yes.</p> <p>16 Q So, Mr. Mills Rogers was also trading in</p> <p>17 Iraqi dinar?</p> <p>18 A I think he had a contact. I don't think he</p> <p>19 was trading in Iraqi dinar. I think he was like an</p> <p>20 introducer, an intermediary, in transactions</p> <p>21 involving Iraqi dinar.</p> <p>22 Q That was both with you and independent of</p> <p>23 you?</p> <p>24 A Everybody got in that industry with</p> <p>25 everybody else. It was kind of a wild west of</p>
<p style="text-align: right;">Page 746</p> <p>1 A. Hanke</p> <p>2 Q Do you know -- do you know if the</p> <p>3 relationship spans before July of 2017?</p> <p>4 A No. I didn't even think it was that far</p> <p>5 back.</p> <p>6 Q So, let me turn your attention to</p> <p>7 AH_094260.</p> <p>8 A Let's see if I can find it here.</p> <p>9 Tell me the number again, sir. I'm sorry.</p> <p>10 Q AH_094260.</p> <p>11 A I was way away from that.</p> <p>12 Okay, sir.</p> <p>13 Q You'll see, three-quarters down the page,</p> <p>14 on October 4, 2017, at 10:10 a.m. --</p> <p>15 A Yes.</p> <p>16 Q -- you state to Mills Rogers [as read],</p> <p>17 "Okay. Desperately need one sealed NIQD box today</p> <p>18 in Miami for an opening."</p> <p>19 Do you see that?</p> <p>20 A Yes, sir.</p> <p>21 Q What does that mean?</p> <p>22 A That's a one sealed box of the Iraqi dinar.</p> <p>23 Q And were you involved in the trading of</p> <p>24 Iraqi dinar?</p> <p>25 A I was.</p>	<p style="text-align: right;">Page 748</p> <p>1 A. Hanke</p> <p>2 people selling and buying.</p> <p>3 Q Let's turn to the next page, 09461.</p> <p>4 A Okay.</p> <p>5 Q And then, at August 8, 2017, there's a</p> <p>6 reference, a third of the way down, to -- from Mills</p> <p>7 Rogers to you [as read]: "Need to discuss ten bond</p> <p>8 FPA and loose IQD and IQD boxes. Thank you, Mills."</p> <p>9 Is that all related to Iraqi dinar?</p> <p>10 A You're looking at 8/8/2017 at 8:59 a.m.,</p> <p>11 yes, sir.</p> <p>12 Q Yes. Yes. Okay.</p> <p>13 He, at one point, mentions to you, on</p> <p>14 October 22, that there was a "Miami Zim deal."</p> <p>15 Does that ring a bell?</p> <p>16 A Yeah, I didn't really get involved with</p> <p>17 Zimbabwe currency.</p> <p>18 Q Ah. Okay.</p> <p>19 He also mentions, at some time, that there</p> <p>20 was a reference to Ghana and Nigeria.</p> <p>21 Was that also currency deals?</p> <p>22 A Yes.</p> <p>23 Q Did you get involved in those deals?</p> <p>24 A Investigated them, but not -- I never</p> <p>25 completed any or did anything with those.</p>

65 (Pages 745 - 748)

<p style="text-align: right;">Page 749</p> <p>1 A. Hanke</p> <p>2 Q Further down on page -- on AH_092463 --</p> <p>3 A Okay.</p> <p>4 Q -- there is a reference to "MTN"?</p> <p>5 A Yes.</p> <p>6 Q Those are medium-term notes?</p> <p>7 A They are.</p> <p>8 Q All right.</p> <p>9 And were you involved in transactions</p> <p>10 involving medium-term notes with Mr. Mills Rogers?</p> <p>11 A I was involved with transactions concerning</p> <p>12 MTNs with many individuals, including Mills Rogers,</p> <p>13 yes.</p> <p>14 Q All right.</p> <p>15 And was Mills Rogers acting as a paymaster</p> <p>16 with respect to the medium-term notes or was he</p> <p>17 acting as a broker?</p> <p>18 A He would have been a broker or introducer.</p> <p>19 Q At one point, he says, "Did you review the</p> <p>20 revised CMO package?"</p> <p>21 Do you know what that refers to?</p> <p>22 A No.</p> <p>23 Can you show me where that's at?</p> <p>24 Q Yeah, sure. It's on AH_09 --</p> <p>25 I'm just going to go chronologically, so it</p>	<p style="text-align: right;">Page 751</p> <p>1 A. Hanke</p> <p>2 Q If you turn to 094271.</p> <p>3 A Okay, sir.</p> <p>4 Q It says -- at 7/23/2018, July 23, 2018, at</p> <p>5 10:30 a.m., you say to Mr. Mills Rogers, "Stand by</p> <p>6 for a call. The person whom you will be meeting is</p> <p>7 Jay Alexander."</p> <p>8 A I see that.</p> <p>9 Q Who is Jay Alexander?</p> <p>10 A Another broker. Don't know.</p> <p>11 Q Did he source transactions for you?</p> <p>12 A There were people all the time sourcing</p> <p>13 transactions and introducing other people. I</p> <p>14 just -- that was just one of them.</p> <p>15 Q Was he involved in any of the transactions</p> <p>16 involving IOLO?</p> <p>17 A I don't know if he was or not.</p> <p>18 The next name there, Mark Bailey, I don't</p> <p>19 know if those two guys were associated or not.</p> <p>20 Q Yeah, that's a good point.</p> <p>21 Let's turn to AH_092472.</p> <p>22 A 272, okay.</p> <p>23 Q And then at 10:22 on that day, which is</p> <p>24 September 5, 2018, you say to him, "Sorry. Am still</p> <p>25 on with Mark Bailey. Will return."</p>
<p style="text-align: right;">Page 750</p> <p>1 A. Hanke</p> <p>2 will make it easier for you.</p> <p>3 It's AH_094264, 11:51 a.m., or -- you say,</p> <p>4 "I have reviewed the CMO in brief."</p> <p>5 A Don't know. I don't recall what that</p> <p>6 means.</p> <p>7 Q Let's turn to 094267.</p> <p>8 A Okay. Go ahead, sir.</p> <p>9 Q Pardon?</p> <p>10 A Go ahead.</p> <p>11 Q Oh. Yeah.</p> <p>12 If you look at 4:52 p.m., the second entry</p> <p>13 on that page.</p> <p>14 A Yes.</p> <p>15 Q He says [as read], "I have a buyer for SPS</p> <p>16 who is paying 300 million per bond in Miami and</p> <p>17 350 million per bond in Zurich."</p> <p>18 Do you see that?</p> <p>19 A Yes.</p> <p>20 Q And this was a transaction in which Mills</p> <p>21 Rogers was -- was referring or sourcing to you?</p> <p>22 A That is correct, yes.</p> <p>23 Q And did you end up doing a deal with him on</p> <p>24 that?</p> <p>25 A I did not.</p>	<p style="text-align: right;">Page 752</p> <p>1 A. Hanke</p> <p>2 A Okay.</p> <p>3 Q And then the next entry says [as read], "Hi</p> <p>4 Alan. Have you set a time to talk with Excelsior</p> <p>5 today? If pm, please text me and I will join the</p> <p>6 cc. Thank you, Mills."</p> <p>7 Do you see that?</p> <p>8 A I do.</p> <p>9 Q Does that refresh your recollection in</p> <p>10 terms of the timing of the Excelsior investment?</p> <p>11 A Timing, no.</p> <p>12 I'm not sure how that all played out</p> <p>13 timing-wise, but it does remind me of the names,</p> <p>14 yes.</p> <p>15 Q Okay.</p> <p>16 And then if you go down to the bottom of</p> <p>17 the page, we see a reference to Javid.</p> <p>18 A I see -- yeah, okay. I'm looking.</p> <p>19 I don't see it, but it doesn't -- on 94272?</p> <p>20 Q Yeah, we can move on. It's not an</p> <p>21 important point.</p> <p>22 A Okay.</p> <p>23 Q Let's go to 094277.</p> <p>24 A Okay, sir.</p> <p>25 Q At the top, Mr. Mills Rogers, at 1:48 of</p>

66 (Pages 749 - 752)

<p style="text-align: right;">Page 753</p> <p>1 A. Hanke</p> <p>2 that -- on that day, says [as read], "All jokes</p> <p>3 aside, do the now missing funds include the second</p> <p>4 deal or are those funds being sent separately?</p> <p>5 Please call to discuss."</p> <p>6 And you respond [as read], "Just the 675</p> <p>7 got messed up. The 1 million will be released later</p> <p>8 today."</p> <p>9 Do you see that?</p> <p>10 A I do.</p> <p>11 Q Do you remember what deal that refers to?</p> <p>12 A No idea. No clue.</p> <p>13 What was the date of this? 10/29/18?</p> <p>14 I have no idea.</p> <p>15 Q 10/29/18 -- 2018, yeah.</p> <p>16 No idea?</p> <p>17 A No.</p> <p>18 Q Well, let's go to AH_094279.</p> <p>19 A Okay.</p> <p>20 Q At the top, on November 7, 2018, he --</p> <p>21 Mr. Mills Rogers indicates that he needs [as read],</p> <p>22 "a five-minute talk about the monthly schedule for</p> <p>23 the two paymaster transactions we closed plus</p> <p>24 possible future transactions next ted, and I need a</p> <p>25 10-minute cc after your 2:00 p.m. today to discuss</p>	<p style="text-align: right;">Page 755</p> <p>1 A. Hanke</p> <p>2 Q But, at this point in time, had Excelsior</p> <p>3 invested money with you or IOLO?</p> <p>4 A I don't remember, at that point, no.</p> <p>5 Q You would have records to reflect that?</p> <p>6 A I would.</p> <p>7 Q And do you know if those were produced to</p> <p>8 us in the litigation?</p> <p>9 A Yes, sir.</p> <p>10 Q There's -- let's turn to AH_094281.</p> <p>11 A Okay.</p> <p>12 Q There is a -- at 11/29/2018, at 5:24, there</p> <p>13 is a reference to a Brad Barker fuel transaction.</p> <p>14 Do you see that?</p> <p>15 A What time, sir?</p> <p>16 Q 11/29 at 5:24, 2018.</p> <p>17 A Okay. Yes, I see it.</p> <p>18 Q What does that refer to?</p> <p>19 A I don't know.</p> <p>20 It was probably another broker that had a</p> <p>21 fuel deal, like everybody did back then.</p> <p>22 No idea.</p> <p>23 Q I think we talked about the -- a gentleman</p> <p>24 by the name of John Rickman?</p> <p>25 A Yes, sir.</p>
<p style="text-align: right;">Page 754</p> <p>1 A. Hanke</p> <p>2 the fall -- 4 Excelsior transactions."</p> <p>3 A Okay.</p> <p>4 Q He goes on to say [as read], "The submarine</p> <p>5 cable deal and the SBLC deal, as we need to talk</p> <p>6 about the schedules and prepare the FPAs. Please</p> <p>7 call my cell. Thank you, Mills."</p> <p>8 So, at this point in time, you had done</p> <p>9 transactions with Excelsior?</p> <p>10 A I don't know if it was Excelsior or not. I</p> <p>11 don't remember who that was or -- at the time. I</p> <p>12 think it had something to do with -- looking back</p> <p>13 above this, I think that had something to do with --</p> <p>14 I don't know if it had something to do with</p> <p>15 Excelsior or not. I don't remember.</p> <p>16 Q You don't have a recollection of the</p> <p>17 submarine cable deal or the SBLC --</p> <p>18 A Oh, sure. Yeah, that was just an</p> <p>19 investment. Some guys were pitching a deal about</p> <p>20 picking up old submarine cables on the ocean floor</p> <p>21 to recycle. That's all that was.</p> <p>22 Q And what about the SBLC deal that's being</p> <p>23 referred to here?</p> <p>24 A Yeah, we were trying to get another SBLC</p> <p>25 deal done, but it never worked out.</p>	<p style="text-align: right;">Page 756</p> <p>1 A. Hanke</p> <p>2 Q And who -- can you remind me who he was</p> <p>3 again?</p> <p>4 A He was one of the people involved with SRM</p> <p>5 Services.</p> <p>6 Q Ah, okay. We talked a lot about them</p> <p>7 yesterday, and I don't want to repeat that. So, I'm</p> <p>8 moving on.</p> <p>9 So, let's go to December 11, 2018, which is</p> <p>10 AH_094283.</p> <p>11 A Okay.</p> <p>12 Q And then, at 2:51 p.m., on that date,</p> <p>13 again, December 11, 2018, it says "The Martino funds</p> <p>14 are in my account."</p> <p>15 Do you see that?</p> <p>16 A I do.</p> <p>17 Q So, does that refresh your recollection as</p> <p>18 to when Martino --</p> <p>19 And is it -- Martino was -- is related to</p> <p>20 Four Points Capital?</p> <p>21 A Yes, sir.</p> <p>22 Q Does that refresh your recollection when</p> <p>23 Four Points Capital made an investment with you?</p> <p>24 A Yes.</p> <p>25 Q And was it in or around this period of</p>

Page 773	Page 775																																																												
<p>1 A. Hanke</p> <p>2 Q Did you review any documents in connection</p> <p>3 with the preparation of the deposition?</p> <p>4 A Other than the one we discussed earlier,</p> <p>5 which you just showed as an exhibit, I did not.</p> <p>6 Q Yeah, I was referring to prior to the</p> <p>7 beginning of the deposition.</p> <p>8 A Sorry, sir. No.</p> <p>9 Q Oh, that's okay. That's fine. I</p> <p>10 understood -- I understood your answer.</p> <p>11 MR. HEFTER: I have no further questions</p> <p>12 for you at this time, Mr. Hanke.</p> <p>13 THE WITNESS: Okay, sir.</p> <p>14 MR. HEFTER: Thank you very much.</p> <p>15 THE WITNESS: Okay. Appreciate you. Thank</p> <p>16 you.</p> <p>17 MR. HEFTER: Thanks, everybody.</p> <p>18 Do you have any -- for the court reporter,</p> <p>19 do you have any questions for us, the lawyers?</p> <p>20 THE VIDEOGRAPHER: I can take us off the</p> <p>21 record if there is nothing further for the</p> <p>22 record, but, Amanda, let me know if you want to</p> <p>23 get anything on the record.</p> <p>24 THE COURT REPORTER: We can go off the</p> <p>25 record.</p>	<p>1</p> <p>2 C E R T I F I C A T E</p> <p>3</p> <p>4 I, AMANDA McCREDO, a Shorthand Reporter</p> <p>5 and Notary Public of the State of New York, do</p> <p>6 hereby certify:</p> <p>7 That the witness whose examination is</p> <p>8 hereinbefore set forth was duly sworn, and that</p> <p>9 such examination is a true record of the</p> <p>10 testimony given by such witness.</p> <p>11 I further certify that I am not related to any</p> <p>12 of the parties to this action by blood or</p> <p>13 marriage, and that I am in no way interested in</p> <p>14 the outcome of this matter.</p> <p>15</p> <p>16 </p> <p>17</p> <p>18 AMANDA McCREDO</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>																																																												
<p>Page 774</p> <p>1 A. Hanke</p> <p>2 THE VIDEOGRAPHER: All right. We are going</p> <p>3 off the record at 6:02 p.m. Central Time, and</p> <p>4 this concludes today's testimony given by Alan</p> <p>5 Hanke. The total number of media units used</p> <p>6 was nine and will be retained by Veritext Legal</p> <p>7 Solutions.</p> <p>8 (Time adjourned: 6:02 p.m.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 776</p> <p>1</p> <p>2 ERRATA SHEET FOR THE TRANSCRIPT OF:</p> <p>3 Case Name: Al-Thani v. Hanke et al.</p> <p>4 Dep. Date: October 5, 2023</p> <p>5 Deponent: Alan J. Hanke</p> <p>6</p> <p>7 CORRECTIONS:</p> <table border="1"> <thead> <tr> <th>8 Pg.</th> <th>Ln.</th> <th>Now Reads</th> <th>Should Read</th> <th>Reason</th> </tr> </thead> <tbody> <tr><td>9</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>10</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>11</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>12</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>13</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>14</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>15</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>16</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>17</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>18</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>19</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> </tbody> </table> <p>20</p> <p>21 Signature of Deponent</p> <p>22 SUBSCRIBED AND SWORN BEFORE ME</p> <p>23 THIS ___ DAY OF ___, 20__</p> <p>24 (Notary Public) MY COMMISSION EXPIRES: _____</p> <p>25</p>	8 Pg.	Ln.	Now Reads	Should Read	Reason	9	—	—	—	—	10	—	—	—	—	11	—	—	—	—	12	—	—	—	—	13	—	—	—	—	14	—	—	—	—	15	—	—	—	—	16	—	—	—	—	17	—	—	—	—	18	—	—	—	—	19	—	—	—	—
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ACKNOWLEDGMENT OF DEPONENT

I, _____, do hereby
certify that I have read the foregoing
pages, and that the same is a correct
transcription of the answers given by me
to the questions therein propounded,
except for the corrections or changes in
form or substance, if any, noted in the
attached Errata Sheet.

ALAN J. HANKE

Subscribed and sworn to
before me on this _____ day
of _____, _____.

Notary Public

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.